

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

**MDL NO. 2843**

CASE NO. 3:18-MD-02843-VC-JSC

HON. VINCE CHHABRIA  
HON. JACQUELINE SCOTT CORLEY  
COURTROOM 4 – 17<sup>TH</sup> FLOOR  
SPECIAL MASTER, DANIEL GARRIE, ESQ.

**AMENDED HEARING ORDER  
REGARDING PLAINTIFFS' MOTION TO  
COMPEL PRODUCTION OF PLAINTIFF  
DATA**

**AMENDED HEARING ORDER REGARDING PLAINTIFFS' MOTION TO COMPEL  
PRODUCTION OF PLAINTIFF DATA**

1 Upon review of the testimony submitted by Facebook in connection with Plaintiffs' Motion to  
 2 Compel Production of the "Named Plaintiff Data" on February 17, 2022, the Special Master orders the  
 3 parties to appear for a Zoom hearing on March 9, 2022, at 10:00 a.m. PT and arrange for a court  
 4 reporter.

5 Facebook must ensure that the following individuals attend the Zoom hearing at 10:00 a.m. PT  
 6 on March 9, 2022, for several hours.

- 7 • Facebook representative responsible for all discovery decisions in the litigation.
- 8 • Eugene Zarashaw
- 9 • Ben Mitchell
- 10 • Facebook privacy engineer(s) that own the systems Facebook uses to comply with the GDPR.
- 11 • Facebook engineer(s) that is knowledgeable about the Hive and the data Facebook infers from a  
 12 user's on or off-platform activity from the data stored in the Hive.
- 13 • Facebook engineer(s) who work on Facebook products that integrate and/or incorporate data  
 14 received from a user's off-platform activities.
- 15 • Facebook engineer(s) who work on Facebook products that integrate and/or incorporate data  
 16 received from a user's off-platform activities.

17 Facebook must submit at least one engineer for each topic listed above.

18 Facebook is also to submit the following documentation to the Special Master on or before  
 19 March 7, 2022, at 12:00 p.m PT.

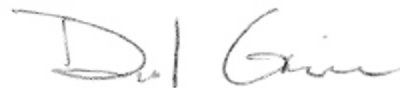
- 20 • Engineer documentation for the process of generating the DYI file for a Facebook user,  
 21 including data flow diagrams that explain how the data is retrieved, data schemas, and the  
 22 individual fields for each data type in the schema.
- 23 • A statement clarifying whether information available via the DYI tool includes user data  
 24 provided by third parties to Facebook, e.g. data relating to users' off platform activity. If the DYI  
 25 tool does not include user data provided by third parties to Facebook, Facebook is to identify the  
 26 systems that store such data.
- 27 •
- 28 •

- A statement identifying systems that coordinate and schedule jobs that run against the Hive (a process that accesses table data in the Hive and aggregates user data to produce a meaningful data set). For each job that may involve user data, Facebook is to describe the data extracted in the job and where the job saves the data.
- A statement identifying the internal identifiers Facebook uses to track users across the Facebook platform, including a description which Facebook systems use each identifier, how each system uses each identifier, and how Facebook maps identifiers to users.
- A statement identifying the sources from which Graph API pulls user data, including a high-level description of each source and the engineer that owns each source.
- Any agreements relating to user data that Facebook has with each of the following entities: Netflix, Microsoft, and YouTube.
- An updated list of the 149 systems identified in the Declaration of David Pope with each system categorized into one or more of the following groups: (1) internal test system; (2) systems Facebook's teams have declared not to store user data; (3) systems that do not serve the Facebook product and serve only other Meta products; (4) systems that do not store unique data, for example serving only as pipelines to transfer data from one system to another; (5) systems from which Graph API cannot call data directly; (6) systems that contain user data that is entirely duplicative of user data already produced; and (7) systems that only contain user data from the previous 30 days or less.

Plaintiffs' may submit technical clarifying questions to the Special Master by March 8, 2022, at 12:00 p.m. PT.

IT IS SO ORDERED.

February 28, 2022



Daniel Garrie, Esq.  
Discovery Special Master